

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN



SAMANTHA PLETCHER; and ADAM PLETCHER) Case No: 20-cv-00811
Plaintiffs,)
vs.) PLAINTIFF'S RULE 26(a)(1) INITIAL
SPARKPLUG CAPITAL LLC, a Delaware Limited-Liability Company.) DISCLOSURES
Defendant.)

)

PLAINTIFF'S RULE 26(a)(1) INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. Rule 26(a)(1), Plaintiffs Adam Pletcher and Samantha Pletcher ("Plaintiffs") make the following Initial Disclosures:

I. Individuals Likely to Have Discoverable Information Related to Plaintiffs' Claims

A. Individuals Associated With Plaintiffs

Adam Pletcher
872 Hunters Ridge Drive
Genoa City, WI 53128
(847) 558-9830
Plaintiff. Full knowledge of dispute

Samantha Pletcher
872 Hunters Ridge Drive
Genoa City, WI 53128
(262) 551-1066

Plaintiff. Full knowledge of dispute

B. Individuals Associated With Defendant

Seth Bent

248 Centennial Parkway, Suite 100
Louisville, CO 80027

Founder and former CEO of Sparkplug Capital, LLC dba Red Dot Storage. Acting CEO at time of acquisition of the storage facility where the accident occurred. Acting CEO at time of actual accident. Knowledge of all aspects of Defendant business operations, including any and all storage facility acquisitions, initial and routine inspections, maintenance and upkeep for said facilities.

Plaintiff reserves the right to amend or modify this list as additional or other witnesses become known

C. Third Party Witnesses

Trac-Rite
314 Wilburn Road
Sun Prairie, WI 53590

(800) 448-8979

Manufacturer of the roll-up door which injured Samantha Pletcher, Provide knowledge and information on the crucial requirement of maintenance to the roll-door system as well as the critical consequences of failing to do so.

Dr. Dana Pletcher, D.C.

700 Florsheim Drive, Suite 12

Libertyville, IL 60048

(847) 367-7131

Chiropractic physician. Provided and continues to provide medical care and treatment to Samantha Pletcher for injuries sustained.

Dr. Jeffrey Watkin, D.C.

700 Florsheim Drive, Suite 12

Libertyville, IL 60048

(847) 367-7131

Chiropractic physician. Provided and continues to provide medical care and treatment to Samantha Pletcher for injuries sustained.

Dr. Jonathon Citow

712 S. Milwaukee Avenue

Libertyville, IL 60048

(847) 362-1848

Neurosurgeon. Expert witness and preeminent expert in the field of spinal injuries and the impact of blunt force trauma similar to that sustained by Samantha Pletcher.

Plaintiff reserves the right to amend or modify this list as additional or other witnesses become known

II. Documents in Possession or Control of Plaintiffs and Related to Plaintiff's Claims

Photographic & video graphic documentation of the storage unit where the incident occurred. These include those taken by Adam Pletcher the following days after the accident and include documentation of the broken torsion springs, lack of white felt tape and overall neglect of disrepair of the critical structural element that is the roll-up door.

Medical records of all treatment, diagnosis since the incident.

Copies of these materials will be provided to Defendants upon request

Plaintiff reserves the right to amend or modify this list as additional or other evidence becomes known.

III. Computation of Damages by Plaintiff

- A. Past Lost Work Opportunities: \$25,000
- B. Future Lost Work Opportunities: \$140,000

- C. Medical Invoices To Date: \$10,000
- D. Future Medical Treatment/Care: \$120,000
- E. Mental Anguish: \$500,000
- F. Punitive Damages: \$750,000
- G. Total: Approximately. \$1.545 million

IV. Insurance Agreements Which May Satisfy Part of Judgment

- A. None aware of by Plaintiffs

Respectfully submitted,

Dated: Nov 11, 2020

By: 
Adam & Samantha Pletcher
Plaintiffs

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Clerk of the Court
United States Federal Building
517 E. Wisconsin Avenue
Room 362
Milwaukee, WI 53202

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Ms. Samatha Pletcher
872 Hunters Ridge Dr.
Genoa City, WI 53128